

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

STUDENTS FOR JUSTICE IN  
PALESTINE AT THE UNIVERSITY OF  
HOUSTON, et al.,

Plaintiffs,

V.

No. 1:24-CV-523-RP

GREG ABBOTT, *in his official capacity only as the Governor of the State of Texas, et al.*,

## Defendants.

## DECLARATION OF BARRI SEITZ

1. My name is Barri Seitz, and I am over the age of 18 and fully competent in all respects to make this declaration. I have personal knowledge of the facts alleged herein because I observed these events. I am making this declaration in connection with the above-captioned cause of action.

2. I am a rising Sophomore at the University of Texas at Austin (“the University of Texas at Austin”), in the Plan II Honors Program, an honors major. At the University of Texas at Austin, I have founded Longhorn Students for Israel, a pro-Israel organization; served on the Executive Board at Chabad, a Jewish religious center; and participated in various organizations affiliated within the Plan II Honors program. I have served in several leadership roles through campus organizations, including Israel Block Party, an annual Hillel event celebrating Israeli culture and values.

3. As a student at the University of Texas at Austin, I had the opportunity to firsthand observe Jewish student life on and around campus. After the October 7, 2023, slaughter of Israeli civilians, Jewish and Israeli organizations at the University of Texas at Austin increased security to protect their students due to the global escalation in violence. Nevertheless, during this past year, pro-Palestinian protests and protestors increased tension and campus disruptions.

4. Specifically, disruption and calls to violence especially increased this past spring semester. First, in January, a student group at the McCombs School of Business hosted an event with Yaron Brook, a prominent Israeli-American business speaker. I attended the event.

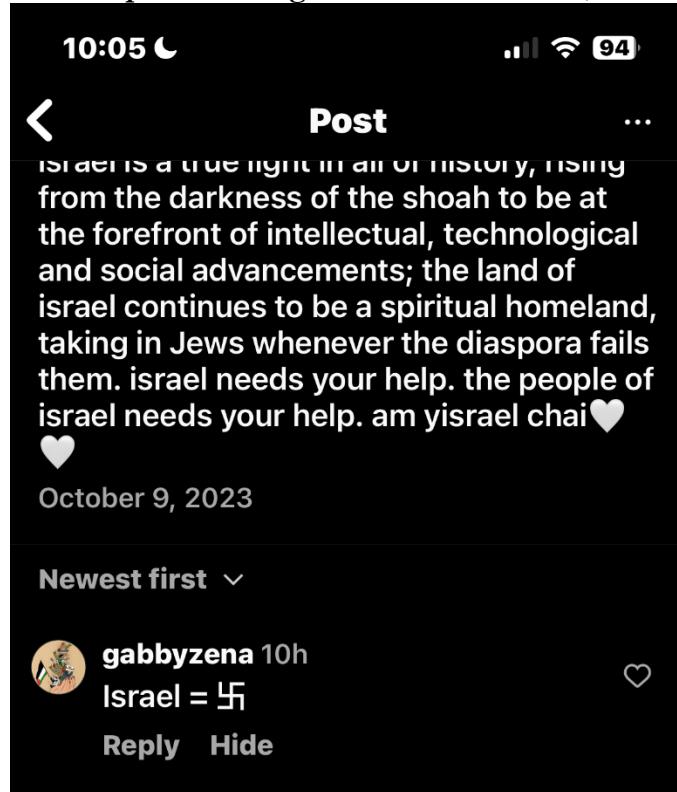
5. Once I arrived at this event, both Mr. Brook and event volunteers notified students that disruptions would not be tolerated, and that disruptive students would be removed after receiving one warning. Nevertheless, pro-Palestinian protesters began to stand up and shout at Mr. Brook, screaming various violent and disruptive phrases. Protestors shouted while Mr. Brook was speaking and over other attendees as they asked questions during a Q&A session. Despite Mr. Brook's warning, there was a disruption nearly every minute. After the first warning, disruptors were removed by the event staff, regardless of what they were saying. A protestor was even forcibly removed by police in handcuffs after they repeatedly interrupted the event and refused to leave. Afterwards, I later learned that the protestor was neither a student nor faculty member at the University of Texas at Austin.

6. After the event, my classmates and I planned to attend weekly Shabbat dinner at Chabad but had to walk out of the way to another building first for our own safety, due to the disruption and threatening activity by pro-Palestinian protesters still on campus.

7. I also received threatening comments directed towards me on my personal Instagram throughout the past semester, such as "Israel = [Swastika]," comparing the state of Israel to the Nazis, and inverted red triangles, which, to my understanding, were first used by military operatives for Hamas, the perpetrator of the October 7, 2023 attack, and currently denote that someone is being targeted for execution for being Israeli or Jewish. The accounts posting these threats were following the Palestinian Solidarity Committee at the University of Texas at Austin ("PSC") at the time that I received the threats.

8. The following picture accurately reflects the post and comments from my Instagram:

Nazi symbols were commented by a PSC follower this year on various posts that I created, including a post I published years ago celebrating fundraising for cancer, as well as a photo talking about the October 7, 2023 attacks<sup>1</sup>



9. As tensions increased globally, users at the University of Texas at Austin on Instagram and other messaging platforms posted “globalize revolution” and “globalize intifada,” in text and graphics. Specifically, I understand that while “intifada” translates to “uprising” in Arabic, “globalize the intifada” calls for people from around the globe to participate in rising up against Israel, and ultimately, encourages targeting institutions, and individuals around the world who show support for Israel, which includes the majority of Jews. Since the first and second intifada in Israel in the 1990s and 2000s included bombings, attacks, and other brazen violence against civilians and resulted in the death of Israelis, I believe these statements to be very violent in nature.

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<sup>1</sup> Exhibit A.

10. Then, leading up to Israel Block Party, PSC made known its plans to disrupt the event. I even saw a pamphlet containing various violent chants that PSC intended to chant at the Israel Block Party event. The day of the event, PSC used devices to amplify noise, and PSC members painted their hands red in reference to a lynching of Jewish people in Ramallah, where two Israeli Defense Forces reservists were brutally murdered by Palestinians and their bodies paraded through the streets.

**Blood on hands, in celebration of the Ramallah Lynchings<sup>2</sup>**



11. At the Israel Block Party event, students also defaced various empty “hostage chairs” that Israel Block Party officials placed to symbolize a call to return the civilian hostages that Hamas kidnapped on October 7, 2023, in addition to students’ displacement of chairs at the event.

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<sup>2</sup> “The Day in Pictures,” THE GUARDIAN, <https://www.theguardian.com/gallery/galleryguide/0,6143,381704,00.html>.

12. Only weeks later, PSC posted a flyer online stating that on April 24, 2024, “class is cancelled,” “lets occupy the main mall.”

Flyer calling for a protest that will cancel classes, during the week before final exams<sup>3</sup>

# **RECLAIM OUR SPACE ON WED APR 24TH**



**CLASS IS CANCELED**

**11:40 WALK OUT OF CLASS  
MEET AT GREG PLAZA  
MARCH TO OCCUPY THE LAWN**

**BRING BLANKETS, FOOD,  
FACE MASKS, AND ENERGY**

13. During this protest, participants at the PSC event chanted “long live the intifada,” “stand with Palestine” and “from the river to the sea, Palestine will be free.” A protestor approached me with a box of face masks and stated, “take this mask to cover your ugly Zionist face.”

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<sup>3</sup> Exhibit B.

14. And, after police officers attempted to clear out the area, I observed a protestor approach a police officer and attempt to spook a police horse by shaking objects in front of the officer, jolting towards the horse.

**Masked student taunting police, before attempting to spook a police horse<sup>4</sup>**



15. I also saw a protestor throw horse manure at a police officer. Ultimately, officers cleared the area and dispersed the crowd.

16. Only days after this protest, I woke up on April 29, 2024, to find someone had written “Zionists can choke and die on their own spit” on a poster hung outside my private campus dorm that houses, and is commonly known to house, many Jewish students:

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<sup>4</sup> Jay Janner, Mikala Compton, and Ricardo B. Brazziell, “Pro-Palestinian protest held at UT-Austin, protesters arrested. Here's what it looked like,” AUSTIN AMERICAN STATESMAN (April 24, 2024), <https://www.statesman.com/picture-gallery/news/2024/04/24/ut-austin-protest-protests-arrest-pro-palestine-walk-out-photos/73441175007>.

Call of death of Zionists, many of whom are Jewish, outside a dorm housing many Jewish students<sup>5</sup>



17. PSC planned another day of protest for April 29, 2024, even though the university had suspended them. Immediately before this protest, I approached a PSC member and asked the protestor about their posters and books. When I was reading the materials, I saw pamphlets that

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<sup>5</sup> Exhibit C.

said “how to start anarchy on a college campus” and “long live the intifada,” materials promoting armed resistance against Israel.

18. Worse yet, the PSC protestors barricaded themselves in an encampment, shielded by signs, umbrellas, and masks to prevent others from discovering their identities, and preventing law enforcement from entering. The protestors even had signs that called for active “resistance,” meaning violence.

19. From both inside and outside the encampment, protestors at the PSC protest told me “go back to Poland” and “go back to Germany,” again referring to the two countries where the Nazis had the most concentration camps during the Holocaust, and subsequently utilized such camps to attempt to ethnically cleanse both countries of Jewish people. These comments made me fear for my safety.

20. I asked PSC members why they were still hosting events, as they had been temporarily suspended. The members told me it was because PSC was “liberating campus.”

21. During this time, I could not get to my final exams or the library to study without having to walk through protest crowds. Worse yet, alarms were constantly going off during exams, interrupting one of the most important academic proceedings of the year. I received constant emails and texts notifying me of incidents on campus and telling protestors to disperse, but they appeared to ignore those notifications.

22. During this time, the Chabad Jewish center increased security outside both the door and the fence-line to protect students during worship. There were also more officers placed around Texas Hillel, another Jewish student center on campus. And, at Alpha Epsilon Phi, a Jewish sorority, students and their families were asked to donate funds to hire an additional security officer to protect students in the chapter house and around the perimeter. Despite the efforts of PSC to disrupt campus life and promote violence, I feel safer on campus as a Jewish student because of the actions of the university.

23. I feel that the university acted reasonably in light of what it knew to prevent student-on-student harassment by protestors, as well as any accompanying violence. Often, the university had to react to a quickly evolving situation, but still took reasonable steps to respond to antisemitic conduct and prevent the creation of a severe, pervasive, and objectively offensive discriminatory environment.

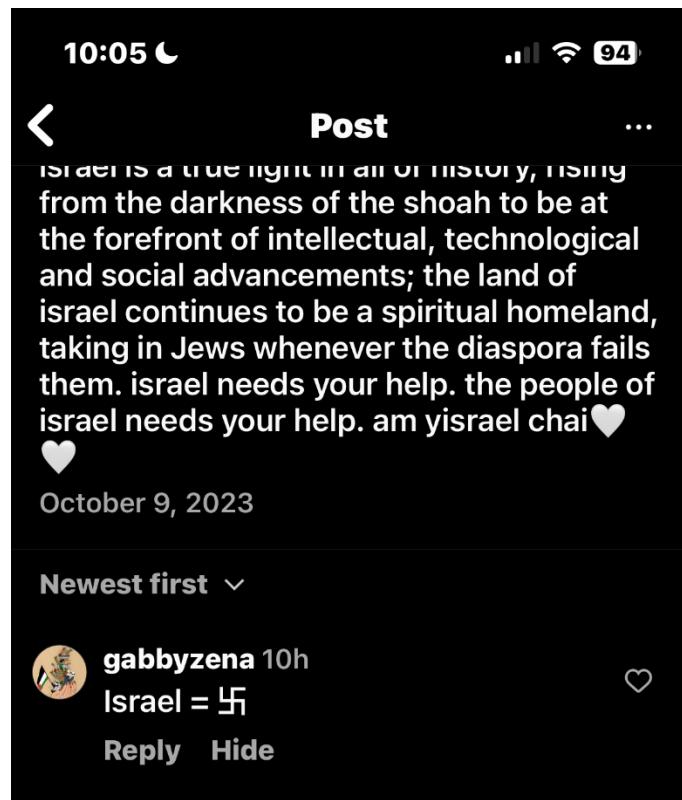
24. All of the factual statements contained within this declaration are within my personal knowledge as events I personally observed and are true and correct.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 18 day of August 2024.

  
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BARRI SEITZ

# **Exhibit A**



# **Exhibit B**

**RECLAIM OUR SPACE ON  
WED APR 24TH**



**CLASS IS CANCELED**

**11:40 WALK OUT OF CLASS  
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# **Exhibit C**

